

UNITED STATES DISTRICT COURT FOR
SOUTHERN DISTRICT OF NEW YORK

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REACH GLOBAL INC., REACH MUSIC
PUBLISHING, INC. and TERRORDOME MUSIC
PUBLISHING, LLC,

Plaintiffs,

Case No.
1:20-cv-00391-AKH

-against-

CARLTON RIDENHOUR and BRING THE NOIZE
MUSIC, INC.,

**DECLARATION OF
EDWARD P. GROSZ**

Defendants.

-----x
CARLTON RIDENHOUR and BRING THE NOIZE
MUSIC, INC.,

Defendants and
Third-Party Plaintiffs,

-against-

MICHAEL CLOSTER,

Third-Party Defendant.

-----x
Pursuant to 28 U.S.C. 1746, Edward P. Grosz, under penalty of perjury, swears to the truth
of the following statements:

1. I am Senior Counsel with the firm of Reitler Kailas & Rosenblatt LLC, attorneys
for Plaintiffs Reach Global Inc. (“Reach Global”), Reach Music Publishing, Inc. (“Reach
Music”) and Terrordome Music Publishing, LLC (“Terrordome”) and Third-Party Defendant
Michael Closter (“Closter”). I make this declaration in support of the motion of Defendants and
Third-Party Defendant to dismiss the First, Second and Third Counterclaims and Third-Party

Causes of Action in their entirety, and the Fourth Counterclaim and Third-Party Cause of Action in part. I am familiar with the record and the proceedings herein.

1. Attached hereto as Exhibit 1 is an agreement dated as of October 22, 2001 between Plaintiff Terrordome and Defendant Bring the Noize Music, Inc. (“BTNM”) (the “2001 Publishing Agreement”).
2. Attached hereto as Exhibit 2 is an agreement dated October 23, 2001, between Plaintiff Reach Global and Plaintiff Terrordome (the “Administration Agreement”), and an amendment thereto dated December 1, 2006.
3. Attached hereto as Exhibit 3 is the Operating Agreement of Plaintiff Terrordome dated January 10, 2002 (the “Operating Agreement”).
4. Attached hereto as Exhibit 4 is an agreement dated as of April 25, 2002 between Plaintiff Terrordome and Defendant Carlton Ridenhour (“Ridenhour”) (the “2002 Publishing Agreement”).
5. Attached hereto as Exhibit 5 is an Assignment of Membership Interests in Terrordome Music Publishing, LLC made as of July 6, 2010 (the “Purchase Agreement”).
6. Attached hereto as Exhibit 6 is an agreement dated as of August 1, 2012 among Plaintiffs Reach Music, Reach Global and Terrordome and Defendants Ridenhour and BTNM (the “Amendment Agreement”).

Sworn to Under Penalty of Perjury Pursuant to 28 U.S.C. § 1746.



Edward P. Grosz

Dated: New York, New York
February 7, 2020